

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a)
SHAREHOLDER.COM,)

Plaintiff,)

v.)

Civil Action No. 04-10535-PBS

CCBN.COM, INC., THE THOMSON)
CORPORATION, JOHN DOES 1)
THROUGH 5, AND JANE DOES 1)
THROUGH 5,)

Defendants.)

**DEFENDANT ADLER'S MOTION TO IMPOUND HIS MOTION FOR
ADDITIONAL TIME TO DEPOSE PLAINTIFF'S OFFICERS AND
OTHER KEY WITNESSES AND SUPPORTING MEMORANDUM**

Defendant Robert Adler ("Adler"), with the assent of counsel for Defendants CCBN.com, Inc. ("CCBN") and The Thomson Corporation ("Thomson"), hereby moves to impound his Motion To Impound His Motion For Additional Time To Depose Plaintiff's Officers And Other Key Witnesses and Supporting Memorandum. Impoundment is necessary because Adler's motion and memorandum contain references to matters that are covered by the Stipulated Protective Order issued by this Court, which Adler does not want to violate.

ROBERT ADLER,

By his attorneys,

/s/ Mark B. Dubnoff

Richard J. McCarthy (BBO 328600)

Mark B. Dubnoff (BBO # 637212)

EDWARDS & ANGELL, LLP

101 Federal Street

Boston, MA 02110

Tel. (617) 439-4444

Fax (617) 439-4170

September 16, 2005

LOCAL RULE 7.1(a)(2) CERTIFICATION

The undersigned hereby certifies, pursuant to Local Rule 7.1(a)(2), that counsel for Adler has attempted to communicate with counsel for the other named parties in good faith to resolve the issues presented in this motion. Counsel for co-defendants agreed to impoundment. Counsel for Plaintiff has withheld his assent to this motion.

/s/ Mark B. Dubnoff

Mark B. Dubnoff